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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WANDA OSBORNE,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 3:19-cv-00671-CLB

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Complaint, currently due on April 6, 2020, by 21 days, through and including April 27, 2020.

This is Defendant's first request for an extension of time. Good cause exists for this extension because counsel wishes to consult with her client to explore whether settlement may be possible in this case.

Defendant's counsel will endeavor to complete this task as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

1 On March 30, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
2 opposition to this motion.

3 It is therefore respectfully requested that Defendant be granted an extension of time to respond
4 to Plaintiff's Complaint, through and including April 27, 2020.

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6 Dated: March 30, 2020

Respectfully submitted,

7 NICHOLAS A. TRUTANICH
8 United States Attorney

9 /s/ Allison J. Cheung
10 ALLISON J. CHEUNG
11 Special Assistant United States Attorney

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13 IT IS SO ORDERED:

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15 UNITED STATES MAGISTRATE JUDGE

16 DATED: March 31, 2020.
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1 **CERTIFICATE OF SERVICE**

2 I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO**
4 **COMPLAINT (*FIRST REQUEST*)** on the date, and via the method of service, identified below:

5 **CM/ECF:**

6 Jared Walker
7 jared@jwalker.law
8 Attorney for Plaintiff

9 Hal Taylor
10 haltaylorlawyer@gbis.com
Attorney for Plaintiff

11 Dated: March 30, 2020

12
13 /s/ Allison J. Cheung
14 ALLISON J. CHEUNG
Special Assistant United States Attorney